

NOT FOR PUBLICATION

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROSS UNIVERSITY SCHOOL OF
MEDICINE and GLOBAL EDUCATION
INTERNATIONAL, INC.,

Plaintiffs,

v.

BEHZAD AMINI, et al.,

Defendants.

Civ. No. 13-6121

ORDER OF PRELIMINARY
INJUNCTION

THOMPSON, U.S.D.J.

This matter comes before the Court upon the application of plaintiffs Ross University School of Medicine (“RUSM”) and Global Education International, Inc. (collectively, “Plaintiffs”) pursuant to Federal Rule of Civil Procedure 65, for entry of a preliminary injunction against defendants Behzad Amini, www.RossU.net, www.RossMedicalSchool.org, www.RossMedSchool.com, and www.JohnDoeRossInfringingSites1-20.doe (collectively, “Defendants”), and the Court having considered the submissions of the parties, and both parties having appeared for oral argument on October 28, 2013,

IT IS on this 9th day of December, 2013, ORDERED THAT:

1. Defendant Amini is hereby required to immediately identify to Plaintiffs’ counsel and the Court each and every URL he has registered that contains the word “Ross,” and Defendant Amini will be considered in violation of this Order if same has not occurred within five (5) business days.

2. Defendants, and all those acting in concert with Defendants, including but not limited to domain name registrars and hosts such as TUCOWS, Inc., Launchingpad.com, HostGator.com LLC, and Unified Layer, are hereby enjoined and restrained during the pendency of this litigation or until further Order of this Court, from:

- a. Directly or indirectly publishing or disseminating, whether through the Offending, Infringing Sites or other outlets or mediums, any statements that would disparage, reflect negatively upon or otherwise call into question RUSM's business operations, products, services, integrity, reputation or business relationships, or the business operations, products, services, integrity, reputation or business relationships of RUSM and/or any of its parent, subsidiary or any other affiliated entities, and any and all of its or their former and current members, principals, directors, officers, shareholders, employees, agents, attorneys, contractors, representatives, affiliates, predecessors, successors and assigns, including but not limited to any further disparaging communications with representatives of RUSM's affiliated institutions or governmental regulators or any of recipients of the emails identified in the Verified Complaint at paragraphs 65, 68, 78 and 82;
- b. Using the Offending, Infringing Sites in any manner; and
- c. Attempting to sell, selling or transferring any interest in the Offending, Infringing Sites other than in conformance with paragraphs 3 and 4 of this Order.

3. Defendants, and all those acting in concert with Defendants, including but not limited to domain name registrars and hosts such as TUCOWS, Inc., Launchingpad.com, HostGator.com LLC, and Unified Layer, are hereby directed to
 - a. Immediately transfer registration of the Offending, Infringing Sites to Plaintiffs, and Defendant Behzad Amini will be considered in violation of this Order if same has not occurred within five (5) business days; and
 - b. Cancel immediately and permanently the links on Defendant Amini's webpage through the Offending, Infringing Sites' URLs, and Defendant Amini will be considered in violation of this Order if same has not occurred within five (5) business days.
4. Each and every applicable registrar with which any of the Offending, Infringing Sites are registered, including but not limited to domain name registrars and hosts such as TUCOWS, Inc., Launchingpad.com, HostGator.com LLC, and Unified Layer, are hereby directed to immediately deem as forfeited or cancelled each domain name for the Offending, Infringing Sites and to transfer of the domain name registrations for same to Plaintiffs, consistent with 15 U.S.C. § 1125(d)(1)(C) within five (5) business days of actual notice of this Order being delivered to such registrars and hosts, notice via electronic means being deemed sufficient service of this Order to comply with applicable rules and due process.
5. Plaintiffs shall not be required to post a bond.

6. This Order will go into effect two days from now; during that time, Defendants may raise any objections.

/s/ Anne E. Thompson

ANNE E. THOMPSON, U.S.D.J.